

EXHIBIT “A”**RICO STATEMENT****QUESTION #2**

DEFENDANT	MISCONDUCT	BASIS OF LIABILITY
Faisal Islamic Bank	<p>On information and belief, the following information is being set forth.</p> <p>Faisal Islamic Bank was founded in 1970 by Yousef M. Nada (“Nada”). Nada is a member of the Egyptian Muslim Brotherhood and the Jamaa al-Islamiya, which is directly allied with al Qaeda. When he came to Saudi Arabia, he became friendly with the Royal Family, though his membership in the Muslim Brotherhood, opened a construction company, and thereafter, founded the Faisal Islamic Bank. Nada has been implicated as a supporter of the Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders, and has been connected to the Al Taqwa Bank, as their president, in supporting Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders.</p> <p>Faisal Islamic Bank is a subsidiary of Islamic Investment Company of the Gulf.</p> <p>There are a number of Faisal Islamic Bank’s across the Islamic world from Egypt to Pakistan to the Emirates and Malaysia. The head of the Faisal Islamic Bank is Prince Turki Al Faisal Al Saud (“Prince Turki”). Prince Turki also held official positions in Saudi Arabia, one of such positions was the Saudi Intelligence chief.</p> <p>During Prince Turki’s tenure as head of Saudi Arabia’s general intelligence service, the Istakhbarat, between 1977 and 2001, the Istakhbarat provided massive financial aid and material support to the Taliban. At the time, Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders and the Taliban maintained a symbiotic and mutually supportive relationship. Prince Turki knew and intended that the support provided to the Taliban by the Kingdom of Saudi Arabia under his direction would materially benefit Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders,</p>	1962(a) 1962(c) 1962(d)

	<p>by virtue of the close relationship and near identity between the two organizations. Additionally, Prince Turki made significant personal contributions to Saudi-based charities that he knew to be sponsors of Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders' global operations, and coordinated the sponsorship of Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders by several wealthy members of Saudi society, knowing that all such contributions would be used to fund Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders' global operations and acts of international terrorism, knowing and intending that those contributions would be used to fund Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders' global operations and acts of terror, the foreseeable culmination of which was the Attack. Prince Turki met several times with Osama Bin Laden and or Osama Bin Laden's representatives on behalf of the Saudi Government and offered not to extradite him and otherwise provide him and Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders with support, in exchange for protection. Additionally, while Prince Turki was both the head of the Faisal Islamic Bank and Saudi Intelligence chief, Faisal Islamic Bank was involved in running accounts for Bin Laden and his associates. Faisal Islamic Bank was one of the main founders of the al Shamal Islamic Bank, the bank which Osama Bin Laden helped to establish in 1991 by providing capital in the amount of \$50 million. At this time, it is believed that Faisal Islamic Bank remains a major shareholder of al Shamal Bank. Al Shamal Bank regularly provided financial and account services to al Qaeda operatives – six of whom held bank accounts at Al Shamal. Osama Bin Laden paid al Qaeda members from Al Shamal accounts. Moreover, money from these Al Shamal accounts was deposited, housed and transferred to other al Qaeda members to buy military equipment, including an airplane which was delivered to Osama Bin Laden to be used to transport missiles.</p> <p>Faisal Islamic Bank was also implicated during the 2001 United States trial relating to the 1998 embassy</p>	
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	<p>bombings in Africa. A former finance manager for al Qaeda in Khartoum, Jamal al-Fadl, testified that Faisal Islamic Bank held bank accounts for al Qaeda operatives by stating:</p> <p>Q: "Where were the accounts [of the al Qaeda] held? In what countries?</p> <p>A: ...we got account in Bank Faisal Islami.</p> <p>Q: Is that also in Khartoum?</p> <p>A: Yes."</p> <p>The growth and development of Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders was made possible by the logistical, financial and other support provided by Faisal Islamic Bank.</p> <p>The events of 9/11 were a direct and intended and foreseeable result of Faisal Islamic Bank's participation. Faisal Islamic Bank controlled elements of Radical Muslim terrorism, and/or the al Qaeda, and/or the International Islamic Front for the Jihad Against Jews and Crusaders' financial infrastructure, including the charities, knew of the threats to the United States, and did nothing to stop them.</p> <p>Faisal Islamic Bank thereby has, for a period of many years, provided critical financial and logistical support to al Qaeda to support that terrorist organization's global jihad. The September 11, 2001 Attacks were a direct, intended and foreseeable product of Faisal Islamic Bank's participation in al Qaeda's jihadist campaign.</p>	
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